

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

INDICTMENT

CHENG LE, :

S1 15 Cr. 38 (AJN)

a/k/a "William Lee," :

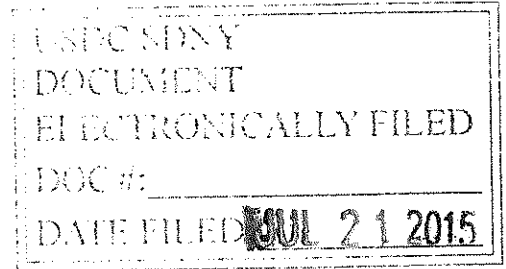
a/k/a "Daniel Chunn," :

a/k/a "Steven Phanatasio," :

Defendant. :

- - - - - X

COUNT ONE



(Attempted Acquisition of a Biological Toxin)

The Grand Jury charges:

1. From at least in or about December 3, 2014, up to and including on or about December 23, 2014, in the Southern District of New York and elsewhere, CHENG LE, a/k/a "William Lee," a/k/a "Daniel Chunn," a/k/a "Steven Phanatasio," the defendant, and others known and unknown, knowingly did attempt to develop, produce, stockpile, transfer, acquire, retain, and possess a biological toxin, to wit, ricin, for use as a weapon.

(Title 18, United States Code, Sections 175(a) & 2.)

COUNT TWO

(Use of False Name in Furtherance of Unlawful Business)

The Grand Jury further charges:

2. On or about December 23, 2014, in the Southern District of New York and elsewhere, CHENG LE, a/k/a "William Lee,"

a/k/a "Daniel Chunn," a/k/a "Steven Phanatasio," the defendant, knowingly, for the purpose of conducting, promoting, and carrying on by means of the Postal Service, any scheme and device mentioned in Title 18, United States Code, Section 1341 and any other unlawful business, took and received from an authorized depository of mail matter a letter, postal card, package, and other mail matter addressed to a name other than his own proper name, to wit, CHENG accepted a package addressed to "Daniel Chunn," for the purpose of conducting, promoting, and carrying on by means of the Postal Service the unlawful activity set forth in Count One of this Indictment.

(Title 18, United States Code, Section 1342.)

COUNT THREE

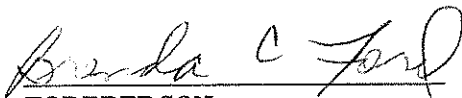
(Aggravated Identity Theft)

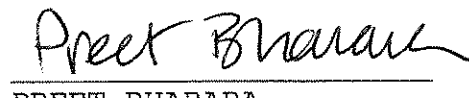
The Grand Jury further charges:

3. From at least on or about December 18, 2014, up to and including on or about December 23, 2014, in the Southern District of New York and elsewhere, CHENG LE, a/k/a "William Lee," a/k/a "Daniel Chunn," a/k/a "Steven Phanatasio," the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 2332b(g)(5)(B), to wit, a violation of Title 18, United States Code, Section 175(a), to wit, LE used the first and last name of "Daniel

Chunn," in connection with his attempt to develop, produce, stockpile, transfer, acquire, retain, and possess a biological toxin, to wit ricin, for use as a weapon.

(Title 18, United States Code, Sections 1028A(a)(2) & 2.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CHENG LE,
a/k/a "William Lee,"
a/k/a "Daniel Chunn,"
a/k/a "Steven Phanatasio,"

Defendant.

INDICTMENT

S1 15 Cr. 38 (AJN)

(18 U.S.C. §§ 175(a), 1028A(a)(2), 1342, 2)

PREET BHARARA

United States Attorney.

A TRUE BILL

Brenda C. Ford
Foreperson

7/21/15 - Filed Superseding Indictment
EF

Judge Fox
VMM